



Environmental Professionals' Organization of Connecticut

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Testimony on behalf of

Environmental Professionals' Organization of Connecticut

Raised Bill H.B. No. 5544

AN ACT REVISING CERTAIN BROWNFIELD RELATED STATUTES

Environment Committee

March 17, 2014

The Environmental Professionals' Organization of Connecticut (also known as "EPOC") was formed in 1996 to represent the interests of Connecticut's Licensed Environmental Professionals. LEPs are individuals authorized by the Connecticut Department of Energy and Environmental Protection to perform investigation and remediation of property in Connecticut and certify, through a Verification, that the property meets the Connecticut Remediation Standard Regulations. The LEPs are therefore directly affected by the policies and procedures established under the General Statutes and their associated regulations for investigation and remediation of contaminated sites in Connecticut, including abandoned or underutilized Brownfields properties. We appreciate the efforts in putting together this bill, because it will facilitate a transformed and improved regulatory program to sensibly protect human health and the environment.

EPOC supports passage of Raised Bill H.B. No. 5544. We believe that inclusion of language to the existing statute pertaining to submission of an "interim verification" by a licensed environmental professional to have satisfied the requirements of the Property Transfer Law is appropriate and consistent with the purpose of the "interim verification" provision, that purpose being to document that investigation of a site has been completed in accordance with prevailing standards and guidelines, and that remediation has been completed in accordance with the Remediation Standard Regulations (RSRs), Section 22a-133k-1 through 3 of the Regulations of Connecticut State Agencies, with the exception that a selected remedy for groundwater pollution is in operation but has not achieved the remediation standards for groundwater. The interim verification identifies the long-term remedy that is being implemented; the estimated duration of the remedy; the ongoing operation and maintenance requirements of the remedy; and demonstrates that there are no current exposure pathways to the groundwater that have not yet met the remediation standards. Submission of an interim verification indicates that environmental conditions at a site no longer present a risk to human health or the environment, which is a milestone in the closure process and the ultimate goal of the investigative and remedial efforts.

We appreciate the opportunity to comment on the raised bill and hope that our comments are helpful in the ongoing effort to improve Connecticut's environmental cleanup program. If you have any questions, please contact Seth Molofsky at (860) 537-0337.